

Before The
Federal Communications Commission
Washington, DC 20554

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In the Matter of:)
)
Amendment of Section 73.202(b)) MM Docket No. 03-141
Table of Allotments,) RM-10703
FM Broadcast Stations.)
(Sierra Vista, Arizona)
Corona de Tucson, Arizona))
_____)

COMMENT AND COUNTERPROPOSAL

Cochise Broadcasting, LLC, (hereinafter referred to as "CB") has proposed that FM Channel 269A be changed to 267C3 and be removed from Sierra Vista, Arizona, and allocated to Corona de Tucson, Arizona. This proposal would remove one (1) commercial audio source from Sierra Vista, Arizona, and add one (1) commercial audio source to the metro Tucson market, which is already well served with commercial audio services.

The Christian Country Network, Inc. (hereinafter referred to as "CCN") has a counterproposal. CCN proposes that commercial FM Channel 269A stay at Sierra Vista, Arizona, providing that smaller market with much needed local commercial audio service operating as KKYZ(FM) under the ownership of CB. CCN proposes

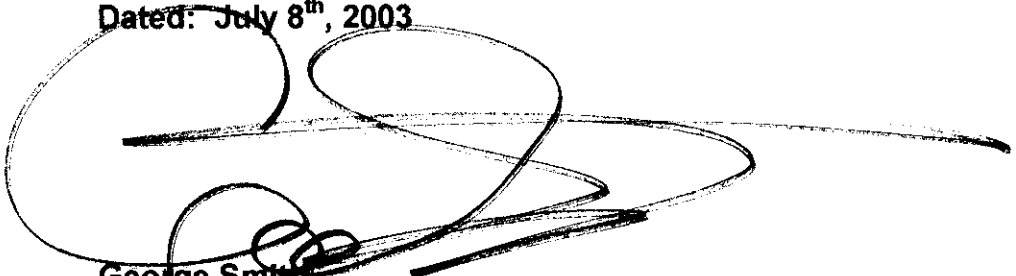
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that FM Channel 267C3* be allocated at Corona de Tucson, Arizona, as a new non-commercial, educational allocation. This would provide Corona de Tucson, Arizona, with its first local audio service. In this way, the public would receive an additional audio service. It is always better to have two (2) broadcast services than just one (1).

CCN would apply for non-commercial, educational FM Channel 267C3* if it was allocated to Corona de Tucson, Arizona, by the Commission. CCN would promptly build and operate the new non-commercial, educational radio station at Corona de Tucson, Arizona, if so authorized by the Commission.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Sierra Vista, Arizona	265A, 269A	265A, 269A
Corona de Tucson, Arizona	None	267C3*

Dated: July 8th, 2003



George Smith
Christian Country Network, Inc.
PO Box 111
Klamath Falls, OR 97601
541-883-6331

PROOF OF SERVICE

STATE OF OREGON, COUNTY OF KLAMATH.

I am a resident in the aforesaid county. I am over the age of eighteen (18) and not a party to the within action. I am readily familiar with the business practice of collection and processing of correspondence for mailing with the United States Postal Service and the fact that the correspondence would be deposited with the United States Postal Service that same day in the ordinary course of business. On July 8th, 2003, I served the forgoing COMMENT AND COUNTERPROPOSAL on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope on this date at Klamath Falls, Oregon, and placed for collection and mailing ordinary business practices addressed as follows:

**Mark N. Lipp, Esq. and J. Thomas Nolan, Esq.
Vinson & Elkins, LLP
The Willard Office Building
1455 Pennsylvania Avenue, NW
Washington, DC 20004-1008**

Dated: July 8th, 2003


Mary Adams